

EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

SVETLANA LOKHOVA,

Plaintiff,

v.

STEFAN A. HALPER,

Defendant.

No: 1:20-cv-01603-LMB-WEF

DECLARATION OF SVETLANA LOKHOVA

I, Svetlana Lokhova, hereby declare as follows:

1. I am competent to give this Declaration, which is based upon my personal knowledge of the facts stated herein.

2. I am the Plaintiff in this matter and over the age of 18.

3. I am the author of the self-published book (the “Book”), *Spygate Exposed, The Conspiracy to Topple President Trump*.

4. The title of the Book is sometimes also printed in hard copy as: “Spygate Exposed, The Failed Conspiracy Against President Trump. Photocopies of the Book cover, its title page, and its copyright page are attached as Exhibit A.

5. The Book was originally published on my personal website in June 2020.

6. The Book was also published and offered for sale to the public on Amazon on November 23, 2020. A copy of the Amazon listing is attached as Exhibit B.

7. I have reviewed the allegations in the Defendant's Counterclaim and specifically the allegations in paragraph 70.

8. I deny defaming the Defendant at any time.

9. Any statements of the nature described by the Defendant in paragraph 70 of his Counterclaims, including to the persons listed or described in that paragraph, were made in the year 2018.

10. I described some of the interactions that are apparently referenced in paragraph 70 of the Counterclaims in a 2018 interview that I gave to the London Sunday Times, which was published on May 27, 2018, so obviously these interactions had already occurred prior even to that date. The Sunday Times article can be found at this link: <https://www.thetimes.co.uk/article/svetlana-lokhova-im-a-mum-under-siege-not-mata-hari-bkggndttq>. A printed copy is also attached as Exhibit C.

11. I have not made any statements of the nature described by the Defendant in paragraph 70 of the Counterclaims to any persons listed or described in paragraph 70, during the one-year period running from July 29, 2022 back to July 29, 2021, or indeed for some time before those dates.

Pursuant to the requirements of 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 19, 2022.



Svetlana Lokhova